

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



December 11, 2006

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at EADS North America Holiday Reception, December 13, 2006

On December 13, 2006, EADS North America (EADS) will host its annual holiday reception at the Corcoran Gallery of Art in Washington, DC. Approximately 1700 individuals have been invited to attend. The event will be widely attended by officials from other Federal agencies, members of Congress and their staffs, representatives from the aerospace industry and various aerospace associations, the media, and academia. The estimated cost of the standup reception, which includes all food and beverages, is \$150 per person.

The host intends to give to each attendee a gift of either a clock or a gold bookmark valued at \$10.00. Either of these gifts, which is under the \$20 exception, can be accepted by Federal employees if they have not met the \$50 cap on gifts from EADS in a calendar year. The reception will allow NASA employees the opportunity to discuss with other guests the accomplishments and progress of the Space program as well as other aspects of common interest.

I find that this event meets the requirements of "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is Agency interests in having NASA personnel attend the event. Accordingly, NASA employees whose duties do not substantially affect EADS, may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties may substantially affect EADS, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon".

R. Andrew Falcon